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14 ROWLAND MARCUS ANDRADE

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16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:20-cr-00249-RS

**DEFENDANT ANDRADE'S MOTION FOR  
ADVANCE NOTICE OF EXHIBITS**

Judge: Hon. Richard Seeborg, Chief Judge

1 Mr. Andrade requests that the Court issue an Order requiring the government to provide  
2 defense counsel with advance notice of the exhibits it will be using at least two days before the  
3 exhibits are offered.

4 The government's exhibit list, which is neither chronological nor organized by issue,  
5 currently includes more than 1500 exhibits, with numbers 1496-1501 having been added by the  
6 government this morning. Worse, some of the exhibits consist of hundreds – and some even  
7 thousands – of pages. Given the volume of exhibits, the length of many of the exhibits, and the  
8 constant additions to the list, defense counsel requests advance notice to provide adequate time  
9 to review, analyze, and assess any potential objections to the evidence the government intends to  
10 use against Mr. Andrade (as well as to have the ability to have hard copies in court).

11 Respectfully submitted,

12 DATED: February 9, 2025

KING & SPALDING LLP

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14 By: /s/ Michael J. Shepard  
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